

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TRUEPOSITION, INC.,

Plaintiff,

v.

LM ERICSSON TELEPHONE COMPANY
(Telefonaktiebolaget LM Ericsson), QUALCOMM
INC., ALCATEL-LUCENT, U.S.A., INC., THIRD
GENERATION PARTNERSHIP PROJECT a/k/a
3GPP, and EUROPEAN TELECOMMUNICATIONS
STANDARDS INSTITUTE,

Defendants.

CIVIL ACTION
2:11-cv-04574-RFK

**SUPPLEMENTAL STATUS REPORT OF DEFENDANT
EUROPEAN TELECOMMUNICATIONS STANDARDS INSTITUTE
AND PLAINTIFF TRUEPOSITION, INC.
REGARDING JURISDICTIONAL DISCOVERY**

Defendant European Telecommunications Standards Institute (“ETSI”) and plaintiff TruePosition, Inc. (“TruePosition”) jointly submit the following supplemental status report regarding jurisdictional discovery as an update to their joint original May 10, 2012 status report (Dkt. 113).

A. Document Production to Date.

On May 23, 2012 ETSI began rolling productions of documents in response to TruePosition’s Second Set Of Document Production Requests to ETSI Relating To Personal Jurisdiction. To date, ETSI has made four productions to TruePosition that have included more than 5,000 documents (more than 20,000 pages), and ETSI anticipates making another

production of approximately 2,000 documents during the week of June 25, 2012.

B. Anticipated Completion of Document Production.

In the May 10, 2012 status report, ETSI estimated that its production of documents would be completed by approximately June 27, 2012, although ETSI noted that this estimated completion date was subject to the volume of data collected for review. Based upon the completed collection process, ETSI anticipates that in addition to the production already completed and contemplated this week, approximately an additional two weeks, to approximately July 13, 2012, will be required to complete the full production of all responsive documents to TruePosition's requests relating to jurisdictional discovery.

ETSI will notify the Court by July 6, 2012 if the projected completion date for document production must be further revised.

TruePosition opposes any further extension beyond July 13, 2012.

C. Dispute Regarding Requests for Admissions.

The parties have continued to meet and confer regarding certain disagreements concerning ETSI's responses to TruePosition's Requests for Admissions. This process is coming to a close. Should the parties fail to resolve their disagreements, TruePosition will file a motion to strike certain responses.

D. Deposition of Adrian Scrase.

On today's date, the parties started the process of discussing a mutually convenient date for the deposition of Adrian Scrase, Vice President, International Partnership Projects, ETSI. On June 25, 2012, TruePosition offered the weeks of August 13 and August 20, and suggested that the deposition take place at the Philadelphia office of Harkins Cunningham. Counsel for ETSI

has inquired regarding the availability of Mr. Scrase and regarding a convenient location. The parties will try to reach an agreement on date and location in the next two weeks.

/s/ Colleen Healy Simpson

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CERTIFICATE OF SERVICE

I hereby certify that on June 25, 2012, I served the foregoing document on all parties to this litigation by ECF and first class mail.

/s/ Derek Care
Derek Care